EXHIBIT Z

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From: Cremona, Nicholas J.

Sent: Wednesday, September 05, 2018 2:52 PM

To: IMCEAEX-

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@48hosting8.local; 'gdexter@chaitmanllp.com' <gdexter@chaitmanllp.com>

Cc: Shifrin, Maximillian S. mshifrin@bakerlaw.com; Sheehan, David J. dsheehan@bakerlaw.com;

Subject: RE: Draft Joint Letter to Judge Maas

Helen and Greg,

We write in response to your below request for the Trustee's position in connection with your proposed submission to Judge Maas. For the reasons set forth in this email, we suggest a meet and confer to discuss these and other open issues in lieu of further proceedings before Judge Maas in the first instance. The Trustee is evaluating a motion to seek additional limited discovery from defendants as contemplated in the Madoff Deposition Orders governing the participating cases, which includes the majority of your cases. In particular, the proposed motion contemplates additional depositions of former BLMIS employees, additional related document production and supplementation of the Trustee's expert disclosures and/or providing additional expert reports. Given the potential overlap between your discovery requests and the discovery contemplated by the Trustee's prospective motion, we believe it would be productive to discuss the issues in your proposed submission as well as the Trustee's motion to see whether we can reach agreement on the scope and timing of the additional discovery and document production, which would include continuing our discussion of the BLMIS Database.

Based on the foregoing, please let us know whether you are amenable to having a meeting next week to discuss these issues and deferring your submission to Judge Maas in the meantime.

We are generally available next week.

Please let us know how your clients would like to proceed.

Thank you.

Nicholas J. Cremona

Partner

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Begin forwarded message:

From: Greg Dexter < gdexter@chaitmanllp.com > Date: September 4, 2018 at 5:52:10 PM EDT

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To: "Shifrin, Maximillian S." <mshifrin@bakerlaw.com>

Cc: "Sheehan, David J." < dsheehan@bakerlaw.com>, Helen Chaitman < hchaitman@chaitmanllp.com>

Subject: Draft Joint Letter to Judge Maas

Max:

I am attaching our portion of a draft joint letter to Judge Maas regarding the discovery dispute over trading records.

Could you please provide the Trustee's position by Thursday or Friday morning so that we can submit this to Judge Maas on Friday?

Thank you, Greg Dexter

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